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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

AUG 02 1999

FCC MAIL ROOM

In the Matter of
Creation of a Low
Power Radio Service

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) MM Docket No. 99-25
) RM-9208
) RM-9242
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Comments of
KLOW-FM, 18643 360th Street, P.O. Box 308, Forest City, Iowa 50436
Anthony G. Coloff, President & General Manager

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I am Anthony G. Coloff, President and General Manager of Pilot Knob Broadcasting, Inc., licensee of a single radio station, KLOW-FM, a C3 FM station, licensed to Forest City, Iowa, population of 4,500. We are a true Micro-Market.

I am 57 and my wife and I have owned and operated this radio station for 21 years, putting it on the air on November 8, 1978. We have struggled to develop enough revenue in order to conform with FCC regulations, and to maintain service. When revenue dwindled from our city of license, we had to increase power to send a reliable signal to reach nearby towns for additional revenue, to maintain the viability of this radio service.

I am alarmed and greatly concerned about the FCC's plans to license low power FM stations for the following reasons:

#1 SAFETY INFORMATION BLOCKED BY INTERFERENCE

I am alarmed and greatly concerned about the interference, degradation and overcrowding, that will occur if 3rd and 2nd adjacent channel spacing regulations are eliminated. While interference from low power stations on 3rd and 2nd adjacent channels will be only a mile or so in radius, this will greatly affect our reliable service that listeners in nearby towns depend on for consistent, reliable, emergency weather information for safety. KLOW frequently transmits emergency warnings for 8 counties for severe thunderstorms and tornados which we often have in Iowa using our Emergency Alert System (EAS).

Radio stations in rural areas of Iowa are spread out and critical emergency information reception needs to be reliable and dependable out to the edge of a stations signal. In addition, inexpensive radios that most people have will be subject to much greater interference by the elimination of 3rd and 2nd adjacent channel spacing regulations.

In addition to stationary radios, mobile radios in cars will be even more affected. In-car listening is very important in rural areas, such as Iowa. Anytime that there is one of these low power stations nearby, there will be interference to mobile listening. The prospect of in-car listeners receiving critical emergency weather safety information with consistent FM reception over a wide area from radio stations will be a thing of the past, diminishing public safety and diminishing the effectiveness of the Emergency Alert System.

#2 IBOC DIGITAL RADIO DEVELOPMENT STOPPED BY ELIMINATING CHANNEL SPACING RESTRICTIONS

The future of the American System of local broadcasting is In-Band, On-Channel digital radio. How can the FCC deny this important development for public service local broadcasters by eliminating channel spacing restrictions, when all of our competitors and the rest of the world have already gone digital?

#3 INTERFERENCE: THOSE WHO DON'T KNOW HISTORY ARE DOOMED TO REPEAT IT WITH LOW POWER FM

A. The FCC was created in 1934 to eliminate interference after chaos on the airwaves from 1927 to 1934. The interference protection standards have created the greatest public service broadcast service in the world. Why is the FCC, which is charged with protecting the integrity, reliability, and dependability of the technical standards, about to destroy that which it is supposed to protect?

B. The AM band got to be so overcrowded in the 60's and 70's, with the addition of too many stations and directional stations shoe horned in, creating interference and degradation, due to lowered interference protection standards, that a later FCC had to create the AM expanded band

from 1610 to 1700 to restore reliable, dependable, listenability to all of the AM band. Why can't the FCC see that if the LPFM proposal is approved, the FM band will have the same overcrowding, interference, and degradation, as the AM band has now?

- C. The Notice for Proposed Rulemaking states that the AM band will not be used for low power radio due to fears of overcrowding, interference, and degradation. If 3rd and 2nd adjacent channel spacing regulations are eliminated, why doesn't the FCC have the same fears that the FM band will have the same deleterious effects of overcrowding, interference, and degradation?

#4 SOLUTIONS ON HOW THE FCC CAN DEAL WITH THE 13,000 REQUESTS FOR A LOW POWER STATION, WITHOUT DESTROYING CONSISTENT, RELIABLE FM SERVICE THAT PEOPLE DEPEND ON FOR CRITICAL EMERGENCY SAFETY INFORMATION

A. FOR SERIOUS BROADCAST BUSINESS REQUESTORS

The National Association of Broadcasters recently completed a national FM frequency search that shows the Federal Communications Commission could authorize additional stations without causing degrading interference to existing stations. There are currently 716 fullpower FM stations that have been allocated , but not applied for. These frequencies provide ample opportunity for the serious broadcast business low power station requestor to enter the broadcast business.

B. FOR LEGITIMATE ENTITIES SUCH AS COLLEGES, CHURCHES, BUSINESS ORGANIZATIONS, AND OTHER ENTITIES THAT NEED LIMITED COVERAGE OF THEIR ORGANIZATIONAL AREA

The Federal Communications Commission should allocate one or two channels in the 87 to 92 mhz frequency area, perhaps at 87.9 and 88.2, and at no more than up to 2 watts, and designate those two channels nationwide for low power radio, so they could be licensed, identified and controlled on those two frequencies. A recent report in the NAB's Radio Engineering "Radio TechCheck" reported that a National Hockey league team in Detroit was able to cover their arena area with an FM signal of just 1.5 watts, so the team could provide "closed circuit" announcements to their ticketholder customers during a game, without causing any of that signal to be heard on the outside of the arena; so it would not cause any interference to any regular FM station outside of the arena.

C. FOR EXPERIMENTERS, THE CURIOUS, FUTURE TECHNICAL PEOPLE, PEOPLE THAT DREAM OF BEING DISC JOCKEYS, PEOPLE THAT JUST WANT TO HEAR THEIR VOICE ON THE RADIO, AND YES, EVEN WACHOS AND PIRATE OPERATORS

Any member of the public, already has the right to broadcast on the radio, either AM or FM, and, without a license. Its called Part 15 of the FCC rules that allow for unlicensed radio stations.

For AM, Part 15 of the FCC rules states that you can be on the air on the AM dial, without a license, by limiting power to 100 milliwatts to the final stage of the transmitter, with an antenna no longer than three meters.

For FM, Part 15 of the FCC rules states that you can be on the air on the FM dial, without a license, by limiting emissions to a field strength of 250 uV/m measured three meters from the antenna.

I now include comments from, Paul Shinn, a Pre-Teen Pirate broadcaster who is now a Chief Engineer at full power radio stations, KSTN-AM-FM in Stockton, California, who was written about in the April 28, 1999, issue of the trade paper Radio World:

"At age 12, I followed Part 15 for AM and covered a couple of miles and had a blast. In the process, I learned a lot. I think Part 15 speaks for itself. If you want to be on the air, you can. Just follow some simple rules: for AM, 100 milliwatts to the final stage of the transmitter, with an antenna no longer than three meters. I would support any responsible micro-broadcaster, as long as they follow the law.

The FCC has provision for the average Joe to be on the air. It's called Part 15. Even though a single Part 15 transmitter has a limited coverage area, the FCC does not stop you from putting more than one transmitter on the air. Part 15 broadcasters can simulcast on more than one legal-power transmitter and enlarge the coverage area. That still will cost less money than purchasing a type-accepted LPFM transmitter and EAS gear.

Nobody wins with LPFM. Not communities, not legitimate broadcasters, and in the long run, not the LPFM hippies.

The only people who would benefit from LPFM are the wachos with minimal investment, who put some LP station on the air, and make their \$1,500 investment back in revenue, then get bored with it, and walk away from it like an outgrown toy."

He called the low-power idea a "fungus".

Nor does this former unlicensed operator have kind words for pirate stations.

He says "The truth is, not one of the pirates I have heard over the years, has had anything but hate, violence, or profanity to offer."

Paul Shinn, chief engineer at KSTN-AM-FM, Stockton, California, quoted in an interview in trade paper Radio World on page 22, dated April 28, 1999.

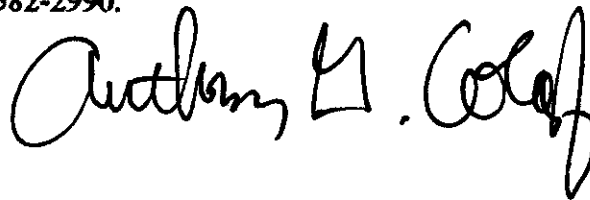
I would seriously recommend that the Federal Communications Commission post Part 15 information on their website and may be even recommend where they can buy type accepted equipment for this type of operation; and then depend on regular broadcasters to report situations that are interfering with legitimate licensed operation, and shut down the violators of the law.

I would recommend that the FCC drop the LPFM Proposed Rule Making, as there are already rules in place to accommodate the 13,000 requests for a low power station, while at the same time maintaining the critical need for consistent, reliable FM service that the public has come to depend on for critical emergency safety weather information.

The existing FCC rules for low power stations already exists. These rules should be communicated and then enforced.

Anthony G. Coloff, President and General Manager, Pilot Knob Broadcasting, Inc., licensee of KLOW-FM, 18643 360th street, PO Box 308, Forest City, Iowa 50436.

Phone: 515-582-3121; FAX: 515-582-2990.

A handwritten signature in black ink, reading "Anthony G. Coloff". The signature is written in a cursive, flowing style with a large initial "A" and a distinct "G" and "C".